

REMARKS

By this amendment, Applicant has amended claims 1, 9, 14, and 18-20. As a result, claims 1-20 remain pending in this application. These amendments are being made to facilitate early allowance of the presently claimed subject matter. Applicant does not acquiesce in the correctness of the objections and rejections and reserves the right to pursue the full scope of the subject matter of the original claims, or claims that are potentially broader in scope, in the current and/or a related patent application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, the Office objects to claims 18-20 due to allegedly informalities. Claims 18-20 recite “program code” for performing actions. The Office asserts that the use of the word “for” allegedly makes it appear as if the actions coming after are the intended use of the programming code and not actual actions that it must perform. The Office further asserts that language that suggests or makes optional but does not require steps to be performed does not limit the scope of a claim or claim limitation. Applicants have amended claim 18 to recite “[a] program product stored on a physical recordable medium for tracking data, the program product including program code, which when executed, enables a computer system to ...” Accordingly, Applicants respectfully request that the Office withdraw the objection.

Further, the Office rejects claims 1-20 under 35 U.S.C. § 102(b) as allegedly being anticipated by Redmond et al. (U.S. Publication No. 2002/0095401), hereinafter “Redmond.” In order to maintain a proper rejection under 35 U.S.C. § 102(b), the Office must show that a single reference discloses each feature of the claimed invention. Applicant submits that the Office fails to show that Redmond discloses every feature of the claimed invention.

For example, with respect to claim 1, Applicants assert that Redmond fails to disclose, *inter alia*, “receiving a request from a client on at least one computing device, wherein the request is at least one of: providing update data for a tracked data item or requesting data for the tracked data item, and **the request includes a tracking type identifier and a session type identifier.**” (Emphasis added). The Office points to paragraphs [0040]-[0041] of Redmond as allegedly disclosing this feature. See Final Office Action, page 4. However, Redmond only discloses that client systems will “request[] data, such as a testing engine or a reporting tool.” See paragraph [0040], lines 2-3. The requested data is then translated by the translation modules 22, if necessary. See *Id.* at lines 3-5. Next, “[t]he engine 20 queues received requests/data messages and parses them while in the queues. It then performs the database operation via the interfaces 24, either writes or reads.” See Redmond, paragraph [0041]. To this extent, Applicants submit that the request of Redmond fails to disclose a tracking type identifier and a session identifier.

With further respect to claim 1, Applicants contend that Redmond fails to disclose “selecting a handler based on the identification of the particular tracked data item using the at least one computing device, wherein the selected handler **provides the particular tracked data item to a data application**; ... generating a response based on the response data using the handler using the at least one computing device, wherein **the handler formats the response for the client based on the tracking type identifier and the session identifier.**” (Emphasis added). The Office points to paragraph [0042] of Redmond to allegedly disclose the selecting feature of claim 1. This portion of Redmond discloses that the each database interface 24 is a Schema Access Object (SAO). Applicants interpret the Office to assert that the SAO database of

Redmond allegedly discloses the handler of claim 1. However, the SAO database of Redmond fails to disclose providing the tracked data item to a data application. The Office points to the product information in the request to allegedly disclose the tracked data item of claim 1. See Final Office Action, page 9 (“Redmond et al. teaches identifying the particular tracked data item by product and vendor.”). Applicants respectfully disagree. The product information of Redmond is sent to the SAO database, while claim 1 provides that the handler provides the tracked data item to a data application. Therefore, Applicants contend that the SAO database does not disclose the handler of claim 1.

Further, the SAO database of Redmond fails to disclose formatting the response for the client. Although Redmond does teach translating, the translating of Redmond is of the initial request (See Redmond, paragraph [0040]), while claim 1 provides a formatting of the response. Even assuming *arguendo* that the translating of Redmond allegedly discloses the formatting of claim 1, Applicants point out that the translation of Redmond is performed by the translation modules 22, not by the SAO database. In contrast, claim 1 provides that the formatting is by the handler, which the Office asserts is allegedly taught by the SAO database of Redmond.

With further respect to claim 1, Applicants assert that Redmond fails to disclose “obtaining response data from the data application based on the tracked data item.” In support of its rejection, the Office points to paragraph [0040] of Redmond to allegedly disclose this feature. See Final Office Action, page 3. However, this paragraph of Redmond only describes that every single translation module 22 receives the request and the first translator that indicates it can handle the request is chosen to handle the request. Applicants do not understand how this feature of Redmond allegedly discloses the obtaining feature of claim 1.

In light of the above, Applicant respectfully requests withdrawal of the rejections of claim 1 and claims 2-8, which depend therefrom, as allegedly being anticipated by Redmond.

With respect to claim 9, Applicants respectfully traverse the rejection and assert that Redmond fails to disclose each and every feature of the claim. Claim 9 provides:

“A method of tracking data, the method comprising:

receiving a request from a client on at least one computing device, wherein the request is at least one of: providing update data for a tracked data item or requesting data for the tracked data item and **the request includes a tracking type identifier and a session identifier; ...**

selecting a handler based on the identifications of the particular tracked data item and the particular client using the at least one computing device, **wherein the selected handler provides the particular tracked data item to a data application;**

obtaining response data for the tracked data item from the data application using the at least one computing device;

generating a response based on the response data using the handler using the at least one computing device, **wherein the handler formats the response for the client based on the tracking type identifier and the session identifier.”** Emphasis added.

For reasons that should be clear from the discussion of Redmond set forth above, Applicants submit that Redmond fails to disclose all the features of claim 9, including the features of “the request includes a tracking type identifier and a session identifier,” “wherein the select handler provides the particular tracked data to a data application,” “obtaining response data

for the tracked data item from the data application,” and “wherein the handler formats the response for the client based on the tracking type identifier and the session identifier.”

In view of the foregoing, Applicants respectfully request that the Office withdraw the rejection with respect to claim 9 and claims 10-13, which depend therefrom.

With respect to claim 14, Applicants respectfully traverse the rejection and assert that Redmond fails to disclose each and every feature of the claim. Claim 14 provides:

“A system for tracking data, the system comprising:

at least one computer, the at least one computer including:

at least one handler for processing a request that is at least one of:

providing update data for a tracked data item or requesting data for the tracked data item and **the request includes a tracking type identifier and a session identifier**; and

a management system for receiving the request from a client, determining an identification of the particular tracked data item in the request, and selecting one of the at least one handlers based on the identification of the particular tracked data item, **wherein the selected handler provides the particular tracked data item to a data application**;

wherein the selected handler **obtains response data for the tracked data item**, generates a response based on the response data, **wherein the handler formats the response for the client based on the tracking type identifier and the session identifier**, and stores the response in a recordable medium.”

Emphasis added.

For reasons that should be clear from the discussion of Redmond set forth above, Applicants submit that Redmond fails to disclose all the features of claim 14, including the features of “the request includes a tracking type identifier and a session identifier,” “wherein the select handler provides the particular tracked data to a data application,” “obtains response data for the tracked data item from the data application,” and “wherein the handler formats the response for the client based on the tracking type identifier and the session identifier.”

In view of the foregoing, Applicants respectfully request that the Office withdraw the rejection with respect to claim 14 and claims 15-17, which depend therefrom.

With respect to claim 18, Applicants respectfully traverse the rejection and assert that Redmond fails to disclose each and every feature of the claim. Claim 18 provides:

“A program product stored on a physical recordable medium for tracking data, the program product including program code, which when executed, enables a computer system to:

receive a request from a client, wherein the request is at least one of:
providing update data for a tracked data item or requesting data for the tracked data item, and **the request includes a tracking type identifier and a session identifier; ...**

select a handler based on identifications of the particular tracked data item and the particular client, **wherein the selected handler provides the particular tracked data item to a data application;**

obtain response data for the tracked data item from the data application;

generate a response based on the response data using the handler, **wherein the handler formats the response for the client based on the tracking type identifier and the session identifier.**” Emphasis added.

For reasons that should be clear from the discussion of Redmond set forth above, Applicants submit that Redmond fails to disclose all the features of claim 18, including the features of “the request includes a tracking type identifier and a session identifier,” “wherein the select handler provides the particular tracked data to a data application,” “obtain response data for the tracked data item from the data application,” and “wherein the handler formats the response for the client based on the tracking type identifier and the session identifier.”

In view of the foregoing, Applicants respectfully request that the Office withdraw the rejection with respect to claim 18 and claims 19-20, which depend therefrom.

Applicant submits that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicant does not acquiesce to the Office’s interpretation of the claimed subject matter or the reference used in rejecting the claimed subject matter. These features have not been separately addressed herein for brevity. However, Applicant reserves the right to present such arguments in a later response should one be necessary and/or in a related patent application, either of which may seek to obtain protection for claims of a potentially broader scope.

CONCLUSION

In light of the above, Applicant respectfully submits that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,

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